

EXHIBIT A TO JOINT PRETRIAL CASE MANAGEMENT PLAN

Event	Parties' Proposal
The parties shall serve initial disclosures pursuant to Fed. R. Civ. P. 26(a)(1)(A)	May 22, 2015
Plaintiffs serve patent infringement contentions pursuant to Local Patent Rule 6	June 22, 2015
Defendant serves patent invalidity contentions pursuant to Local Patent Rule 7	July 22, 2015
The parties shall exchange proposed claim terms for construction	August 31, 2015
The parties shall exchange preliminary claim constructions with citation to supporting evidence	September 18, 2015
Deadline to amend pleadings	September 30, 2015
The parties shall file a Joint Disputed Claim Terms Chart pursuant to Local Patent Rule 11	September 30, 2015
Claim construction discovery cut-off	October 2, 2015
Plaintiffs shall file and serve its opening claim construction brief	October 13, 2015
The parties shall file and serve any early summary judgment motion regarding claim construction issues	October 13, 2015
Defendant shall file and serve its responsive claim construction brief	November 13, 2015
The parties shall file and serve an opposition to any summary judgment motion regarding claim construction issues	November 13, 2015
Plaintiffs shall serve and file a reply claim construction brief	November 20, 2015
The parties shall file and serve a reply in support of any summary judgment motion regarding claim construction issues	November 20, 2015
Claim construction and Summary judgment hearing	<i>[TBD – Court to Schedule]</i>
The parties shall file a further Pretrial Case Management plan	Fourteen (14) days after claim construction order and order on summary judgment
The parties will use best efforts to	Sixty (60) days after claim

schedule non-binding mediation	construction order and order on summary judgment
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